

## **REMARKS**

Reconsideration is respectfully requested.

The specification has been amended to correct typographical errors therein. Claims 4 and 19 have been amended to clarify the subject matter recited therein and thereby overcome the rejection under 35 U.S.C. 112, second paragraph. Independent claims 1, 21 and 27 have been amended to respectively incorporate limitations found in dependent claims 3, 23 and 29, which are now cancelled.

Amended independent claims 1, 21 and 27 are believed to be patentably distinct from the anticipation references under 35 U.S.C. 102(e) of Vaid and Natarajan. In particular, these claims now recite that the policies implemented by the claimed subject matter are “based on a policy definition language that defines (1) primitive events representing a single network element event, (2) basic events representing a group of primitive events occurring within a single time epoch, (3) complex events representing an accumulation of primitive events over plural time epochs, (4) internal events generated in response to network elements failing to take required actions, and (5) policy defined events generated by said policies according to policy defined event rules.” It is noted that neither Vaid nor Natarajan discloses the use of a policy definition language capable of defining all of the foregoing five event types.

In column 16, line 6 – column 17, line 10 of Vaid, which is relied on to reject cancelled claim 3, there is a discussion about rules, classes and policies, and how each is designed to handle different kinds of information associated with traffic transmitted on a network link. For example, it is stated that rules apply to “very specific groups of flows or more general groups of flows,” classes also apply to “groups of flows” and additionally to information such as “source, destination, application file types, URLs and other features,” and policies apply to “overall

bandwidth guarantees, bandwidth limits, priority of services, how individual sessions within a class are serviced or admitted, and other aspects.” What is thus being discussed in this passage are different levels of policy scope based on different categories of traffic information. The passage does not address how events are defined and generated and there is no mention of the specific kinds of events recited in amended claims 1, 21 and 27.

In column 14, lines 56-61 of Natarajan, which is relied on to reject cancelled claims 23 and 29, there is a discussion about each policy containing a specific set of rules for analyzing specific information. Different kinds of rules are also discussed and it is then mentioned that the rules can be dynamically-reconfigured at run time. The passage does not address how events are defined and generated and there is no mention of the specific kinds of events recited in amended claims 1, 21 and 27.

In view of the foregoing, it is respectfully submitted that the anticipation rejections of claims 1, 21 and 27 have been overcome. As such, dependent claims 2, 4-20, 22, 24-26, 28 and 30-31 must also be considered to overcome the anticipation and obviousness rejections variously applied thereto.

In addition, several of the dependent claims contain additional limitations not found in the references, including:

Claim 6 – Vaid and Stevens do not disclose or suggest the claimed system wherein an event filter in a policy proxy is configured to perform one or more of processing events into a device independent format, aggregating primitive events into basic or complex events, and raising internal events that reflect non-occurrence of expected events. Column 4, lines 41-49 of Stevens, which is relied on to reject claim 6, mentions storing local policy definitions at policy-enabled devices, but none of the three features recited in claim 6 are mentioned; namely: (1)

processing events into a device independent format; (2) aggregating primitive events into basic or complex events; and (3) raising internal events that reflect non-occurrence of expected events.

Claim 16 – Vaid does not disclose an administrative module implementing a graphical user interface for tracing policies run by said policy processing point, said interface being configured to allow users to select actions and trigger events involved in said policies, and to trace sources that cause said actions or trigger said events. Although Figs. 9-15 of Vaid, which are relied on to reject claim 16, depict administrative GUIs, the functionality specified in claim 16 does not appear to be present.

Claim 17 -- Vaid does not disclose or suggest a system as claimed including a debugging tool for testing and debugging policies, said debugging tool being responsive to questions about said policies under hypothetical circumstances by providing information about operational conditions of said system under said circumstances. In column 17, lines 8-10 of Vaid, which is relied on to reject claim 17, it is only stated that policy validation prevent users from defining contradictory or ambiguous rules. It would not have been obvious from this limited functionality of Vaid to conceive a system as recited in claim 17 wherein a debugging tool is responsive to questions about policies under hypothetical circumstances. This represents substantial additional capability that is neither explicitly nor impliedly suggested by Vaid.

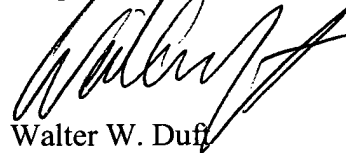
Claim 18 – Vaid does not disclose or suggest a system as claimed wherein said debugging tool is configured to respond to (1) queries requesting an event history that will trigger a specified action or sequence of actions, and (2) queries requesting completion of an event history until a specified action is triggered. In column 17, lines 8-10 of Vaid, which is relied on to reject claim 17, it is only stated that policy validation prevent users from defining contradictory or ambiguous rules. It would not have been obvious from this limited functionality

of Vaid to conceive a system as recited in claim 18 wherein a debugging tool is configured to respond to (1) queries requesting an event history that will trigger a specified action or sequence of actions, and (2) queries requesting completion of an event history until a specified action is triggered. This represents substantial additional capability that is neither explicitly nor impliedly suggested by Vaid.

In view of the foregoing, Applicants respectfully request that all rejections be withdrawn and that Notices of Allowability and Allowance be duly issued.

Applicants direct attention to the **CHANGE OF CORRESPONDENCE ADDRESS** form enclosed herewith, and requests that the undersigned representative's new address information be entered into the file wrapper.

Respectfully submitted,



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